
 U.S. DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK
 DATE 5/28/08

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALICE KRAMER, as Personal Representative	:	
of the Estate of Arthur Kramer,	:	
	:	
Plaintiff,	:	
	:	
—against—	:	
	:	
	:	
LOCKWOOD PENSION SERVICES, INC.,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	
	:	

NOTICE OF MOTION TO ADMIT MICHAEL J. MILLER *PRO HAC VICE*

PLEASE TAKE NOTICE that Katherine L. Villanueva hereby moves this Court, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission *pro hac vice* of:

Michael J. Miller
 DRINKER BIDDLE & REATH LLP
 One Logan Square, 18th and Cherry Streets
 Philadelphia, PA 19103
 Telephone: (215) 988-2700
 Facsimile: (215) 988-2757

Michael J. Miller is a member of the firm of Drinker Biddle & Reath LLP, and he is a member in good standing of the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Michael J. Miller in any state or federal court.

Dated: May 23, 2008

DRINKER BIDDLE & REATH LLP



Katherine L. Villanueva (KV5283)

DRINKER BIDDLE & REATH LLP
140 Broadway, 39th Floor
New York, NY 10005
(212) 248-3140

*Attorneys for Defendant Lincoln Life &
Annuity Company of New York*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALICE KRAMER, as Personal Representative	:	
of the Estate of Arthur Kramer,	:	
	:	Case No.: 08 CV 2429-DAB-MHD
Plaintiff,	:	
	:	
—against—	:	
	:	
LOCKWOOD PENSION SERVICES, INC.,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	
	:	

**AFFIDAVIT OF KATHERINE L. VILLANUEVA IN SUPPORT OF MOTION FOR *PRO
HAC VICE* ADMISSION**

KATHERINE L. VILLANUEVA being duly sworn according to law, upon her oath deposes and says:

8. I am associated with the law firm of Drinker Biddle & Reath LLP, attorneys for Defendant Lincoln Life & Annuity Company of New York (“Lincoln”). I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of Lincoln’s motion for Michael J. Miller to be admitted to participate in this action *pro hac vice*.

9. I am a member in good standing of the bar of the State of New York, and I was admitted to practice law in July 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

10. I have known Michael J. Miller since August 2006.

11. Mr. Miller is an attorney with Drinker Biddle & Reath LLP and is a resident of Drinker Biddle's Philadelphia office. Mr. Miller is a member of good standing of the Bar of the Commonwealth of Pennsylvania. A copy of Mr. Miller's certificate of good standing from the Commonwealth of Pennsylvania is annexed hereto as Exhibit A.

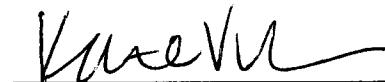
12. I have found Mr. Miller to be a skilled attorney and person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

13. Accordingly, I am pleased to move the admission of Michael J. Miller, *pro hac vice* in this action.

14. I respectfully submit a stipulation and proposed order granting the admission of Michael J. Miller, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Michael J. Miller, *pro hac vice*, to represent Defendant Lincoln Life & Annuity Company of New York in the above referenced matter, be granted.

Dated: May 23, 2008

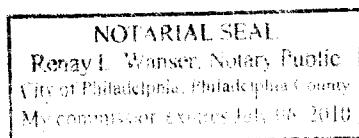


Katherine L. Villanueva (KV5283)

Sworn to before me this 23rd
day of May, 2008.



Renay L. Wanzer
Notary Public





Supreme Court of Pennsylvania

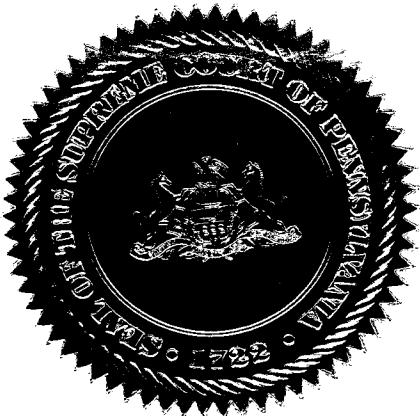
CERTIFICATE OF GOOD STANDING

Michael John Miller, Esq.

DATE OF ADMISSION

November 27, 1991

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: May 14, 2008

A handwritten signature in black ink that appears to read "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

CERTIFICATE OF SERVICE

I, Katherine L. Villanueva, hereby certify that on the date set forth below, I mailed copies of the foregoing documents via Federal Express to the following individuals:

Andrew A. Wittenstein
Friedman & Wittenstein, P.C.
600 Lexington Avenue
New York, NY 10022
(212) 750-8700
Fax: (212) 223-8391

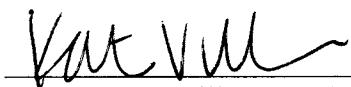
Stephen Ross Herbert
Locke & Herbert
1114 Avenue of The Americas, 40th Fl.
New York, NY 10036
(212) 935-8787
Fax: (212) 935-5663

Christopher George Karagheuzoff
Dorsey & Whitney LLP
250 Park Avenue
New York, NY 10177
(212) 735-0793
Fax: (212) 953 7201

I also hereby certify that on the date set forth below, I submitted courtesy copies of the aforementioned, marked as courtesy copies, by overnight Federal Express to the following:

The Honorable Deborah A. Batts, USDJ
United States Courthouse
500 Pearl St., Room 2510
New York, NY 10007
(two copies)

The Honorable Michael H. Dolinger, USMJ
United States Courthouse
500 Pearl St., Room 1670
New York, NY 10007
(one copy)



Katherine L. Villanueva (KV 5283)
Drinker Biddle & Reath LLP
140 Broadway, 39th Floor
New York, NY 10005
(212) 248-3140

Dated: May 23, 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALICE KRAMER, as Personal Representative	:	
of the Estate of Arthur Kramer,	:	
	:	Case No.: 08 CV 2429-DAB-MHD
Plaintiff,	:	
	:	
—against—	:	
	:	
LOCKWOOD PENSION SERVICES, INC.,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	
	:	

ORDER GRANTING MOTION TO PRACTICE *PRO HAC VICE*

The motion for admission to practice *pro hac vice* in the above captioned matter is granted. The admitted attorney, Michael J. Miller, is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

IT IS SO ORDERED.

Dated: May __, 2008

Judge Deborah A. Batts